

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI**

WILLIE E. COWANS,

Plaintiff,

vs.

Civil Action No. 3:15-cv-077-MPM-JMV

NORTH CENTRAL ELECTRIC POWER ASSOCIATION,

Defendant.

RESPONSE TO MEMORANDUM OF COMPLAINT

COMES NOW North Central Electric Power Association, by counsel, and in response to the Memorandum of Complaint filed in this cause says as follows:

FIRST DEFENSE

The Memorandum of Complaint fails to state a claim upon which relief can be granted and should be dismissed.

SECOND DEFENSE

The Memorandum of Complaint filed in this cause is so vague and ambiguous that this Defendant cannot reasonably prepare a response. It fails to allege any specific actions, dates, or other factual allegations. This Defendant therefore moves the Court to require the Plaintiff to file a more definite and specific statement of his claim.

THIRD DEFENSE

Without waiving the above and foregoing defenses, but reserving the same, to the extent that the Memorandum of Complaint contains any factual allegations stating or purporting to state a claim against this Defendant, the same are hereby denied. This Defendant further reserves all affirmative defenses which are available at law or in equity.

Respectfully Submitted,

BRIDGFORTH & BUNTIN, PLLC
*Attorneys for North Central Electric Power
Association*

s/ Taylor Buntin
Taylor Buntin (MSB #7525)
5293 Getwell Road
Southaven, MS 38672
(662) 393-4450

CERTIFICATE OF SERVICE

I, Taylor Buntin, attorney of record for the Defendant, North Central Electric Power Association in the above styled and numbered cause, do hereby certify that, I electronically filed the foregoing with the Clerk of the Court using the MEC system, and thereafter mailed a copy of the same to the following:

Willie E. Cowans
6604 Center Hill Rd.
Olive Branch, MS 38654

Dated this the 28th day of October, 2015.

s/ Taylor Buntin
Taylor Buntin